

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

DEBBIE PLUCKER, Plaintiff, vs. UNITED FIRE & CASUALTY COMPANY, Defendant.	Civ. 12-4075 DEFENDANT'S EXHIBIT LIST
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Defendant United Fire lists the following exhibits which may be used in defense of Plaintiff's claims at trial:

- a. Ms. Plucker's United Fire insurance policy.
- b. Ms. Plucker's policy renewal documents.
- c. Ms. Plucker's medical and psychological records and bills.
- d. United Fire's claim file.
- e. Blank Authorization for Release of Medical Information originally provided to Ms. Plucker.
- f. Ms. Plucker's Authorization for Release of Medical Information dated June 1, 2011.
- g. Ms. Plucker's Authorization to Use or Disclose Health Information dated July 26, 2012.
- h. Ms. Plucker's medical authorization dated May 8, 2012 from Shelley Sandbulte, Inc.
- i. Ms. Plucker's medical authorizations to the Social Security Administration via South Dakota Department of Human Services.
- j. Letter from Michael Bornitz to Sherri Wade dated August 1, 2012.
- k. Letter from Michael Bornitz to Lon Kouri dated November 1, 2012.
- l. Letter from Lon Kouri to Michael Bornitz dated December 12, 2012.

- m. Robert E. Underdown's report dated September 8, 2014.
- n. Accident Report from the May 24, 2011, accident.
- o. Photos of Ms. Plucker's vehicle following the accident.

In addition to the above, Defendant reserves the right to introduce such other exhibits as may be necessary to rebut Plaintiff's claims and/or the testimony of Plaintiff's witnesses or experts. Defendant also reserves the right to offer such exhibits as may be necessary for impeachment or cross-examination.

Dated this 14th day of March, 2016.

MAY & JOHNSON, P.C.

BY /s/ Eric D. DeNure
Lon J. Kouri
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Defendant's Exhibit List** was served through the Court's ECF system upon Michael D. Bornitz and Robert D. Trzynka, Cutler & Donahoe, LLP, 100 N. Phillips Avenue, P.O. Box 1400, Sioux Falls, SD 57101-1400, attorneys for Ms. Plucker, this 14th day of March, 2016.

/s/ Eric D. DeNure
Eric D. DeNure